



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626**

Ref: 8MO

October 15, 2008

Ms. Deborah L.R. Austin
Forest Supervisor
Lolo National Forest
Building 24A, Fort Missoula
Missoula, Montana 59804

Re: CEQ 20080368; DeBaugan Fuels Reduction
Project Final Environmental Impact
Statement

Dear Ms. Austin:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) for the DeBaugan Fuels Reduction Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to EPA and other agency and public comments on the DEIS. We remain supportive of the purpose and need of the DeBaugan Fuels Reduction Project to reduce hazardous fuels and fire risk in wildland urban interface (WUI) areas in western Mineral County near the communities of DeBorgia, Haugan, Saltese, and Cabin City where there is high fire risk.

We do want to indicate that we had some concern about an FEIS response which stated that watershed improvement opportunities are not considered authorized hazardous fuel reduction projects for proposals under the Healthy Forests Restoration Act (HFRA). We believe it is important that opportunities for watershed improvement are considered during planning of land management projects, particularly projects proposed in watersheds of waterbodies designated as water quality impaired under Section 303(d) of the Clean Water Act. The Clean Water Act goal of restoring and maintaining the physical, chemical and biological integrity of the Nation's waters is applicable to all projects, including HFRA projects.

We recognize that the Lolo National Forest has been an active and cooperative participant in efforts to improve water quality on impaired streams, and we consider the FEIS response to have simply been poorly phrased. Watershed improvement opportunities do appear to have been considered for the DeBaugan Fuels Reduction

Project. The FEIS states that 12 miles of existing road would be placed in long-term storage following use, and 4 additional miles of road would be decommissioned, and that several culverts identified as fish passage barriers will be removed with the road closures, and two fewer miles of road construction and two additional miles of road closure are proposed in the FEIS. The FEIS also clarifies that the proposed 3.5 to 4 miles of long-term road construction would occur on mid-to-upper slopes and ridge tops away from streams, and that all but one mile of this road would be placed in long-term storage following use, with the road gated year round. It is further stated that sediment reductions associated with proposed BMP improvements on haul roads would offset sediment increases anticipated from fuel treatments. The FEIS also reports that the Lolo National Forest has carried out extensive watershed restoration work in the St. Regis River watershed, including 66 miles of road decommissioning, remedy of 61 fish passage barriers, and 2100 feet of stream restoration work. We recognize and appreciate this consideration given to watershed improvement, and believe these activities belie the FEIS response that watershed improvement activities are not considered within HFRA fuel reduction projects.

We also want to note that even though language in the DEIS stating that roads would not be treated in the no action alternative was deleted from the FEIS (the responses to comments said this was a source of confusion), our concern about the adequacy of routine maintenance of forest roads and resultant water quality effects remains. We are pleased that 44 miles of haul roads will undergo BMP improvements as a result of the Debaugan Fuels Reduction project, and that sediment reductions are anticipated from this road maintenance work. However, we believe it is important that roads be properly maintained with routine BMP improvements on an on-going basis to minimize sediment delivery to streams from roads. We have concerns that some of the sediment reduction benefits of the preferred alternative over no action result from the fact that road BMPs are not upgraded on a routine basis. The FEIS indicates that 219 miles of road under Forest Service jurisdiction are located in the Debaugan project area. We remain concerned about the adequacy of maintenance and road BMPs on the other 175 miles of Forest Service roads in the project area, and resultant water quality of effects of inadequate road maintenance.

As stated in our DEIS comments, it is known that prolonged under-funding of road maintenance on National Forests has resulted in degraded road conditions, and that there is a significant backlog of road maintenance needs on National Forests (Source: *"Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis*, March 22, 2007). We believe it is important to continue to focus attention on the adequacy of funding to maintain and improve roads to reduce adverse effects on water quality and fisheries. We encourage improved funding for road maintenance and emphasize the need for decommissioning of roads which cause resource damages and which cannot be adequately maintained. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities.

The EPA appreciates the opportunity to review and comment during the EIS process. If you have any questions regarding our input please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John F. Wardell". The signature is fluid and cursive, with a large initial "J" and a stylized "W".

John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena, MT
Sharon Sweeney, District Ranger, Superior, MT

